## JERROLD OPPENHEIM

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July 27, 2004

Richard A. Visconti General Counsel KeySpan Energy Delivery New England 52 Second St. Waltham, Mass. 02451

Thomas O'Neill Counsel KeySpan Energy Delivery New England 52 Second St. Waltham, Mass. 02451

Cheryl M. Kimball, Esq. Keegan, Werlin & Pabian 265 Franklin St. Boston, Mass. 02110

RE: KeySpan Energy Delivery of New England, consolidated CGAC, DTE 04-62

Dear Mssrs.. Visconti and O'Neill and Ms. Kimball:

Below is the first set of data requests of the Low-Income Parties in this proceeding. They reflect substantially the same questions discussed with Mr. Visconti.

- 1. Please refer to par. 2 of the Petition. Please provide a copy of the Supply Plan approved Jan. 30, 2003.
- 2. Please refer to par. 3 of the Petition. Please provide a copy of all Company filings and Department orders describing changes in gas commodity procurement procedures and strategies, including but not limited to the monthly procurement of one-twelfth of non-storage supplies.

- 3. (a) Please state whether the practice at Boston Gas of monthly procurement of one-twelfth of non-storage supplies is applied to the (i) Colonial and (ii) Essex territories. (b) If the answer to (a) is "no," please state whether the Company is willing to immediately extend the practice of monthly procurement of one-twelfth of non-storage supplies to the (i) Colonial and (ii) Essex territories. (c) If the answer to (c) is "no," please explain in detail and include copies of all workpapers quantifying support for the conclusion.
- 4. Please refer to the practice at Boston Gas of monthly procurement of one-twelfth of non-storage supplies. (a) Please state whether the Company has considered extending this practice over a longer term, such as 24 or 36 months instead of the current 12 months. (b) If the answer to (a) is "yes," please provide copies of all the analyses performed, including their conclusions. Include all workpapers quantifying support for the conclusion reached.
- 5. Please refer to Exh. KED/AEL-3b, p. 4, showing bill increases for Essex Gas R-4 (Low-income Heating) customers of 10.0% to 12.0%, depending on usage (higher consumption results in higher bill increases). Please provide a copy (or, where not available, a full description) of each mitigation measure, if any, that the Company (a) has adopted and (b) plans for these customers.
- 6. Please refer again to Exh. KED/AEL-3b, p. 4. Please state whether the Company is willing to immediately expand the OnTrack program on a proportional basis to its Colonial and Essex territories.

Thank you,

Sincerely, Low-income Parties, by

cc:

DTE e-filing
Mary Cottrell, Secretary, DTE
John Cope-Flanagan, Esq., Hearing Officer, DTE
Ken Dell Orto, Alexander Kofitse, Gas Division, DTE
Colleen McConnell, Esq., Joseph Rogers, Esq., Office of the Attorney General
Elliott Jacobson, Action Inc.